

436

The State of Alabama }
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Grant, Dubose,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Louisa Dubose,

against said

Grant Dubose,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 23rd day of May,

192 4.

T. W. Richerson
Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Original

Serve on _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Louisa Dupont

vs.

Grant Dupont

H.P. Mosser
Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this _____
day of _____ 192_____

Sheriff.

Executed this _____ day of _____
192_____ by leaving a copy of the within summons with

Defendant.

Sheriff.

By _____
Deputy Sheriff.

I hereby accept service of the within
summons and waive service of same by
the Sheriff.

Witness: _____

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STATE OF ALABAMA, : IN THE CIRCUIT COURT OF
:
BALDWIN COUNTY. : BALDWIN COUNTY, ALABAMA,

IN EQUITY.

TO THE HONORABLE J. D. LEIGH, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, - - - - -IN EQUITY.

Your Oratrix, Louisa Dubose, respectfully represents
and shows unto Your Honor as follows:

FIRST.

That she is a bona fide resident citizen of Baldwin
County, Alabama, and is over the age of twenty-one years; that she
has resided in Baldwin County for more than three years preceding the
filing of this bill.

That Grant Dubose is a resident of Baldwin County,
Alabama, and is over twenty-one years of age.

That Your Oratrix, Louisa Dubose, is residing at
Tensaw, Alabama.

That the said Grant Dubose resides at Lottie, Alabama.

SECOND.

That Your Oratrix and the said Grant Dubose were
lawfully married in 1914; that they resided together as husband and
wife until, towit:- April, 1918, when defendant voluntarily abandoned
complainant without just cause or excuse and without fault on her part;
that at the time of said abandonment said defendant and complainant
were residing in Baldwin County, Alabama; that they have not lived
together since abandonment.

PREMISES CONSIDERED complainant prays this Honorable
Court will take jurisdiction of the cause made by this bill of com-

plaint and by appropriate process be required to plead, answer and demur to this bill of complaint under the usual penalties and within the time required by law; that upon the final hearing of this cause, complainat be granted by this Honorable Court, an absolute divorce from the said Grant Dubose; and that such other further or different orders and decrees be made and entered as in the premises shall be meet.

Henry D Moore
Solicitor for Complainant.

FOOTNOTE: Defendant is required to answer every allegation in the foregoing bill, paragraph one to two inclusive, but not under oath. Oath is hereby expressly waived.

Henry D Moore.
Solicitor for complainant.

penalties prescribed by law and the practice of this Honorable court.

PRAYER FOR RELIEF

Complainant further prays that upon the consideration of this cause your Honor will grant your Oratrix a decree of absolute divorce from the said Grant Dubose, and that Complainant may have such other, further, different and general relief as the facts in equity and good conscience may entitle her to receive. And as in equity bound, complainant will ever pray.

Rickaby Beebe & Hall
Solicitors for Complainant

Respondent is required to answer each paragraph of the foregoing bill of complaint numbered from FIRST to THIRD, inclusive, but not under oath. Oath is hereby expressly waived.

Rickaby Beebe & Hall
Solicitors for Complainant.

Louisa Dubose,
Complainant,

Vs.

Grant Dubose,
Defendant.

: IN THE CIRCUIT COURT,
:
: BALDWIN COUNTY, ALABAMA,
:
: In EQUITY.
:
:
:
:
:

Comes, Grant Dubose, Defendant, in the above styled cause and for answer to same denies each and every allegation contained therein and demands strict proof of same. He waives service of subpoena by the Sheriff on said bill, notice of the filing of interrogatories, or any proceeding to take testimony on oral or written examination as well as the right to cross examine, and consents that this cause be submitted for decree on note of testimony made by the Register either in term time or vacation.

Dated this 14th day of May, 1924.

Grant Dubose

WITNESSES:

J. G. Gordon
Justice of the Peace



The State of Alabama, }
Baldwin County.

No. 437

CIRCUIT COURT, IN EQUITY

Ben Joiner,

Complainant

vs.

Ida Mae Joiner

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the Complainant is forever divorced from the Defendant.

on account of adultery.

It is further ordered, that the said Ben Joiner,

be, and he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Ben Joiner

pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then

execution for such costs may issue against the said Ida Mae Joiner,

It is further ordered, adjudged and decreed that said Ben Joiner,

shall not again marry except to said Ida Mae Joiner,

until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to

said Ida Mae Joiner, during the pendency of said appeal

This 15th day of September 1924

John D. Leigh
Judge of the Circuit Court of Baldwin County.

THE STATE OF ALABAMA, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

I, Register of said Circuit Court of said County,

Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on

the day of 192, in the cause of

Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the day of 192

Register.

No. 437.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Ben Joiner,

vs.

Ida Mae Joiner,

DECREE OF DIVORCE.

Filed in office this

16th

day of *September*, 192*4*

D. W. Hillman

Register.

E. O. M.

RECORDED

19th September 1924
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RECORDED
THE STATE OF ALABAMA

CIRCUIT COURT IN EQUITY
BALDWIN COUNTY, ALA.

The State of Alabama }
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Ida Mae Joiner

of Waldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Ben Joiner

against said

Ida Mae Joiner,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 9th day of April

1924.

T. W. Richerson
Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Serve on

2 J. J. J.

Circuit Court of Baldwin County
In Equity

No.

SUMMONS

vs.

Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this
day of 192

Sheriff.

Executed this day of
..... 192

by leaving a copy of the within summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

I hereby accept service of the
within summons and waive service
of same by the sheriff.

X Elda Mae Joines.

Witness:

Sullivan Senter
Walter W. Joines

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Ben Joiner Complainant

vs.

Ida Mae Joiner Defendant

Oral examination before the Register of the following witnesses:

Ben Joiner and Rannia Joiner

who reside in Alabama, said examination being conducted in Baldwin Alabama,

on this the 19th day of April, 1924, and there being present

The said Witness being first sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

Testimony of Ben Joiner:

My name is Ben Joiner. I am a resident of Baldwin County, Alabama and have resided here all my life. I am over 21 years of age. Ida Mae Joiner is over 21 years of age and resides at Dyas, Baldwin County, Alabama. Ida Mae Joiner and myself were married in the year 1919 and lived together as man and wife until about February 15th, 1924 at which time the said Ida Mae Joiner ~~committed~~ was in company with a man by the name of Dan Hadley and I afterwards learned that she had committed adultery with Dan Hadley and I have ^{not} connived or condoned the said offense. The act of adultery was committed in Baldwin County, Alabama.

Sworn and subscribed to before me this 19th day of April, 1924.

Ben Joiner
D. W. Richardson
Register.

Testimony of Rannia Joiner:

I am personally acquainted with Ben Joiner and Ida Mae Joiner. About February 15th, 1924, I saw Dan Hadley and Ida Mae Joiner together at the house of Ben Joiner having sexual intercourse with one another. They were out in the yard near the corner of the house. This was in Baldwin County, Alabama.

Rannia Joiner

Sworn and subscribed to before me this 19th day of April, 1924.

T. W. [Signature]

Register.

I, J. W. Reardon, as Register

hereby certify that the foregoing deposition..... on oral examinationtaken down by me in writing in the words of the witness me and read over to them and they signed the same in the presence of myself , at the time and place herein mentioned; that I have personal knowledge of the personal identity of the said witness....., or had proof made before me of the identity of said witness me; that I am not of counsel or of kin to any of the parties to said cause; or in any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court, and placed the same on file in my office.

Given under my hand and seal this the 19th day of April, 1924,
J. W. Reardon (L. S.)

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$

REGISTER'S FEES.

.....	days at \$1.50 per day	\$
.....	words at 20 cents per hundred	

The State of Alabama,

_____ COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Blair Jones

vs. Complainant,

*Helena
Minnie Jones*

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of *Witness*

for *Complainant*

Filed *19* day of *Apr*, 19*24*

Published by order of the Court, _____

day of _____, 19____

T. M. Rice

Register.

STATE OF ALABAMA, : IN THE CIRCUIT COURT, BALDWIN COUNTY,
: :
BALDWIN COUNTY. : ALABAMA, IN EQUITY.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA, - - - -IN EQUITY.

Your Orator, Ben Joiner, respectfully represents
and shows unto Your Honor as follows:

FIRST.

That he is a bona fide resident citizen of the County
of Baldwin, and State of Alabama, and resided in said County and
State for a period of more than three years next before the
filing of this bill of complaint, and that he is over the age
of twenty-one years.

That Ida Mae Joiner is a resident of Baldwin County,
Alabama, residing at Dyas, Alabama, and that she is over the age
of twenty-one years.

SECOND:

That Your Orator and the said Ida Mae Joiner were married
in Baldwin County, Alabama, were married in the year 1919 and lived
together as man and wife until, to-wit:- about February 15th., 1924;
that the said Ida Mae Joiner committed the act of adultery with a
man by the name of Dan Hadley at which time we separated and
have not lived together since, nor did Your Orator connive or condone
the said act of adultery, said act was committed in Baldwin County,
Alabama.

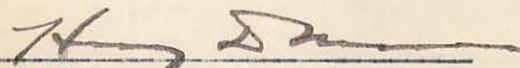
PRAYER FOR PROCESS.

The premises considered, your Orator respectfully
prays that the said Ida Mae Joiner be made a party respondent
to this bill of complaint by the usual process of this Honorable
Court and that she be required to demur, plead to or answer the
same within the time and under the penalties as provided by law, or
that the same be forever confessed.

PRAYER FOR RELIEF.


That upon the final hearing of this cuase your Honor will grant unto your Orator an absolute divorce from the said Ida Mae Joiner.

That if your Orator is mistaken in the relief above prayed for then your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled to receive, he will ever pray, etc.


Solicitor for Complainant.

FOOTNOTE:

The respondent, Ida Mae Joiner, is required to answer each and every allegation of the foregoing Bill of Complaint from 1st to 2nd, both inclusive, but not under oath, answer under oath being hereby expressly waived.


Solicitor of Complainant.

Ben Joiner, : IN THE CIRCUIT COURT,
Complainant, :
 : BALDWIN COUNTY, ALABAMA,
 :
vs. : In Equity.
 :
 :
Ida Mae Joiner, :
Defendant. :
 :

Comes Ida Mae Joiner, Defendant, in the above styled cause and for answer to same denies each and every allegation contained therein and demands strict proof of same. She waives service of subpoena by the Sheriff on said bill, notice of the filing of interrogatories, or any proceeding to take testimony on oral or written examination as well as the right to cross examine, and consents that this cause be submitted for decree on note of testimony made by the Register either in term time or vacation.

Dated this 10 day of April, 1921.

Ida Mae Joiner

WITNESS:

Sullivan Sants

Walter W. Joiner

NOTE OF TESTIMONY

The State of Alabama,

Ben Joiner

Complainant

VS.

Ida Mae Joiner.

Respondent

No. _____

In Circuit Court,
In Equity

IN THIS CAUSE comes the Complainant,

by his solicitor and submits the same for Final decree,

decree upon the Original Bill and exhibits thereto answer

, and upon the following testimony, to-wit:

Ben Joiner and Rannie Joiner,

I hereby certify that the above note of Testimony is correct.

This 22nd, day of April, 1924.



Register.

3

No. **RECORDED**

The State of Alabama

Baldwin County

Circuit Court in Equity

RECORDED

Benjamin

RECORDED Complainant

vs.

Iola Mae Jones

RECORDED Respondent

NOTE OF TESTIMONY

Filed *22* day of *Apr*, 19*24*

J. W. Rice Register

Record Page

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. Spring Term, 1914....

Ben Joiner,

Complainant.....

vs.

Ida Mae Joiner,

Defendant.....

To T.W.Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taking against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the

Complainant, by H.D.Moorer Atty.

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

H.D.Moorer,

Solicitor for Complainant.

RECORDED 4 RECORDED

No. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY.

Bur Jones

RECORDED vs.

Helen Mae Jones

REQUEST FOR DECREE IN
VACATION.

Filed *Apr 22* 19*24*

T. Williams
Register

RECORDED

Recorded in Record

Vol. Page

Register